

WT Docket No. 98-143
Comments by William A. Burns

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the matter of
1998 Biennial Regulatory Review)
Amendment of Part 97 of the Commission's)
Amateur Service Rules)

WT Docket No. 98-143
RM-9148
RM-9150
RM-9196

COMMENTS OF

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November 4, 1998

I currently hold an Advanced Amateur Service license WA6QYR, and have been continuously licensed since 1961.

I am currently an ARRL Volunteer Examiner, and have been one continuously since 1984.

I have taught many amateur radio classes to youths and adults in my town. I am familiar with the performance levels and success rates for examinees for Amateur Service licenses

Summary

1. I agree with the proposed deletion of the Novice and Technician Plus license classes. I propose that all current Novice and Technician Plus licensee's be "Grandfathered" to General Class upon license expiration or renewal.
2. I agree with the proposed changes in VE examination structure to allow General Class VE's to examine Technician Class candidates and allow Advanced Class VE's to examine both Technician and General Class candidates.
3. I agree with the proposed removal of the RACES station license class.
4. I support the continued effort by the Amateur Auxiliary working with the Compliance and Information Bureau per the internal adjustment of the FCC to promote a responsible use of the Amateur Service spectrum.
5. I propose that access to the Amateur Service frequencies below 30 MHz require a single 7 wpm code test in addition to the present written examination.
6. My own experience clearly shows that the current written examination technology content in the question pool supplied by the National Conference of Volunteer Examiner Coordinators is adequate.

Comments

1. I agree with the Commissions proposal to delete the Novice and Technician Plus license classes as explained in Section IV Discussion paragraph A of the Instant docket.

A. I concur with the Commissions proposal that the entry level license class be the Technician Class as it is currently configured.

B. I propose that a single 7 wpm Morse Code receiving examination be required for access to the Amateur Service bands below 30 MHz in addition to the appropriate written examinations to gain the General, Advanced, or Extra Class license.

C. Advancing to higher class license with additional spectrum privileges should continue to be served by additional written examinations in present practice. The current Novice frequency power limitations should be removed and the frequencies made available to any General or higher class amateur. The current emission mode restrictions should remain in place for those frequencies.

D. To deal with the amateurs currently licensed in the Novice and Technician Plus Classes, I propose that they be "Grandfathered" to the General class upon their next license renewal or 610 action. The grandfathering will eliminate those classes from FCC records within 10 years, and means that these classes will not be renewed and kept as an additional administrative burden for Commission personnel.

2. I agree with both the ARRL proposal and the FCC proposal that the General Class licensed VE be allowed to examine the Technician Class candidate and that the Advanced Class licensed VE be allowed to conduct the Technician and General class examinations. Only Advanced and Extra Class examinations should require the Volunteer Examiner to be an Extras Class licensed VE. This will allow a larger pool of Volunteer Examiners to be utilized for the substantial majority of examinations. The Extra Class Volunteer Examiners would then be able to concentrate on administering the much smaller number of Advanced and Extra Class examinations.

3. I agree with the proposed phase out the RACES station license. In the vast majority of cases, most stations are manned by volunteers holding Amateur Service Licenses and a redundant license is an unnecessary burden on Commission resources.

4. I support the continued efforts of the Amateur Auxiliary and their work with the FCC CIB to provide more responsible use of the Amateur Service spectrum. From information reported in the October 1998 ARRL Letter and the November 1998 QST magazine published by the ARRL, I believe that internal restructuring of Amateur Service compliance issues from the Wireless Bureau to the Compliance and Information Bureau will provide more effective enforcement, which, by example, will result in reduced violations.

5. I recommend a single 7 wpm test to qualify an applicant for Amateur Service spectrum privileges below 30 MHz be required in addition to the current written examination. I believe that successfully demonstrating Morse Code proficiency at 7 wpm is sufficient to demonstrate the knowledge required by international rules. The 7 wpm speed is between the 5 wpm speed where there is sufficient time to think between characters and the 10 wpm speed where most people have to practice sufficiently for the use of the Morse Code to become essentially automatic. This speed is often a mental block or hurdle for many applicants, and many find it very difficult to exceed 10 wpm without many hours of practice. The examinee could either successfully complete the fill-in-the-blank questions or provide one full minute of exact copy out of a five minute code examination duration to entitle him to the General or higher class license as is current practice. The only ITU requirement is for a licensee to know the code. This single speed examination would allow the elimination of the three different speed examinations currently required, allowing a single unified examination demonstrating proficiency in the Morse Code to be administered.

This single Morse Code examination will simplify the VE examination procedures. The present more difficult written technology examinations required for the higher classes of licenses will continue to demonstrate an applicants above average to superior technical knowledge. Obtaining the privileges of the use of additional HF spectrum will continue to serve as motivation for obtaining a higher grade of license.

6. I believe the present technology content of the written examination as provided by the National Conference on VEC's is adequate. I believe that they will continue to provide updated materials as technology expands in the future.

CONCLUSIONS

I support the Commission proposals to eliminate the Novice and Technician Plus Class licenses. I support the Commissions proposal to authorize Volunteer Examiners to administer examinations while holding a license only one grade above that of the examination being administered. I support the Commission proposal to eliminate the RACES License. I propose a single 7 wpm Morse Code examination be required for access to spectrum below 30 MHz. I state that the current technology content of the examinations is proper and sufficient.

Respectfully submitted

A handwritten signature in black ink, appearing to read "William A. Burns", written in a cursive style.

William A. Burns